



# START

Department of Energy

Richland Operations Office  
P.O. Box 550  
Richland, Washington 99352

JUN 24 1991

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91-ERB-123

Mr. Timothy L. Nord  
Hanford Project Manager  
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Department of Ecology  
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Olympia, Washington 98504-8711

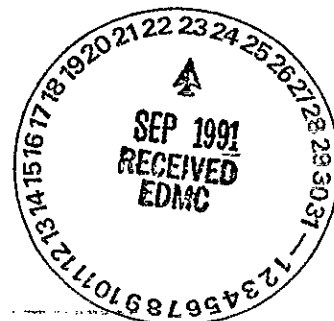
Dear Mr. Nord:

ADDRESSING COMMENTS AND RESCOPING FOR THE 100-HR-1, 100-HR-3, AND 100-DR-1  
OPERABLE UNITS

- References: 1) Letter, Mr. T. L. Nord, WDOE, to Mr. S. H. Wisness, DOE-RL,  
dated April 30, 1991. (016272)
- 2) Justification to Support Change Request Package for Hanford  
Past-Practice Milestones Change Control Form Number  
M-12-90-4, draft of May 8, 1991. (013996)

This is in response to your letter of April 30, 1991, concerning submittal of Draft C work plans for the 100-HR-3, 100-HR-1 and 100-DR-1 operable units. As you pointed out, we met with the State of Washington Department of Ecology (Ecology) representatives in Olympia on April 24, 1991, to discuss comment resolution for HR and NR work plans. At that meeting, we agreed to evaluate whether it would be possible to submit Draft C work plans for the 100-HR-3, 100-HR-1 and 100-DR-1 operable units by July 1, 1991. However, these discussions took place before the subsequent agreement between the U.S. Department of Energy, Richland Operations Office (DOE-RL), Ecology and the U.S. Environmental Protection Agency (EPA) to rescope the work in these operable units.

As you are aware, DOE-RL, Ecology and EPA have tentatively agreed on a change package to the Hanford Federal Facility Agreement and Consent Order to gain efficiencies in the past-practice investigation process. One change is a revision to milestone M-12-00, including the establishment of new interim milestones that call for the submittal of "rescoped" work plans for the 100-HR-3, 100-HR-1 and 100-DR-1 operable units by September 1991. Consequently, we now plan to submit documents in support of this milestone.



Mr. Timothy L. Nord

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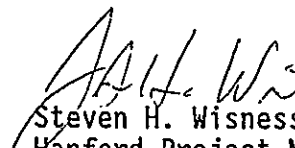
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Rescoping activities have already begun for these operable units. Rescoping meetings were held on May 29, 1991, for 100-HR-1, June 7, 1991, for 100-DR-1 and June 18, 1991, for 100-HR-3. Another meeting is planned to rescope ecological investigations for 100-HR-3. However, there is an urgent need to determine how rescoping decisions will be reflected in work plans or how they will otherwise be documented. This is especially important in considering that elements such as a baseline risk assessment and studies of the effect of the Columbia River on the hydrology and contaminant migration within the 100-Area operable units will now be addressed on a 100 Area-wide basis rather than within the workscope of each operable unit. EPA, Ecology and DOE-RL representatives tentatively plan to meet on June 27, 1991, to make decisions on documentation of rescoping efforts.

If you have questions or comments, please contact Ms. Julie Erickson on (509) 376-3603 or Mr. David Shafer on (509) 376-4670.

Sincerely,

  
Steven H. Wisness  
Hanford Project Manager

ERD:DSS

cc: P. T. Day, EPA  
J. C. Lehr, EM-442  
R. E. Lerch, WHC  
T. B. Veneziano, WHC

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Correspondence No.

S. H. Wisness, RL

T. L. Nord, Ecology

Incoming 9102497

Xref 9101762B

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Subject: ADDRESSING COMMENTS AND RESCOPING FOR THE 100-HR-1, 100-HR-3, AND  
100-DR-1 OPERABLE UNITS

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This letter negates the action due via letter 9101762B, submit Draft C of the subject work plans by July 1, 1991. Also, this incoming letter should be cross-referenced to incoming #9101778, dated May 3, 1991, regarding submittal of the 100-NR-1 and 100-NR-3 work plans by November 1, 1991.